REMARKS

In the application claims 21, 23, 24, 27-29, 31, 34-36, 39, 44, 46, 48-50, 56-58, 64, and 65 remain pending. Claims 1-20, 22, 25, 26, 30, 32, 33, 37, 38, 40-43, 45, 47, 51-55, and 59-63 have been canceled.

In the Office Action all of the pending claims were rejected under 35 U.S.C. § 102 as allegedly being anticipated by Mott (U.S. Patent No. 6,170,060). The reconsideration of the rejection of the claims is, however, respectfully requested.

In rejecting the claims it was asserted that Mott discloses a local server (or equivalent) in client computer system 214, a remote facility (or equivalent) storing content to be downloaded to the local server via a WAN in library server 260, and a device for receiving downloaded content from the local server via a LAN in playback device 212. It is, however, respectfully noted that, while Mott does disclose a system in which playable content is transferred from the library server 260 to the client computer system 214 (Col. 5, lines 32-39) whereupon the downloaded, playable content is transferred, via mobile device interface 221, to *any/all* client device(s) coupled to the client computer system 214 (Col. 5, lines 15-31), Mott makes no mention of interacting with the client computer system 214 to establish a "schedule" for automatically delivering content *from the client computer system 214 to a playback device 212* ***after*** content is downloaded from the library server 260 to the client computer system 214 or interacting with the client computer system 214 to associate a particular playback device with content *to be downloaded* (i.e., before downloading) for the purpose of automatically delivering content to a playback device *when content is actually downloaded* from the library server 260 to the client computer system 214 as is claimed.

To the extent that Mott generally describes in Col. 11, lines 1-25 that content may be downloaded *from the library server 260* to the client computer system 214 at either the time of purchase or "sometime after the purchase," it is respectfully noted that this disclosure fails

to disclose, teach, or suggest interacting with a client computer 214 itself to provide a "schedule" for automatically delivering content *from the client computer system 214 to a playback device 212* ***after*** content is downloaded from the library server 260 to the client computer system 214 as is equivalently set forth within the claims. Furthermore, it is respectfully submitted that the disclosed downloading of content *from the information library server 260* to the client computer 214 "sometime after purchase" or "multiple times after an initial purchase" does not infer that which is claimed but instead infers that the content may be downloaded to the client computer 214 from the library server 260 by again initiating a visit to the library server 260 "sometime after purchase" or "multiple times after an initial purchase." Accordingly, because Mott simply fails to expressly or inherently disclose the exact invention that is set forth within the claims as is required to maintain a rejection under 35 U.S.C. § 102, e.g., Mott fails to disclose, teach, or suggest scheduling a time with a LAN server at which stored, retrieved content (content *that has already been downloaded* to the LAN server from a remote facility via a WAN) is automatically delivered from the LAN server to a playback device via a LAN, it is respectfully submitted that the rejection of the claims under 35 U.S.C. § 102 must be withdrawn.

To the extent that Mott generally describes in Col. 8, lines 17-19 that client identifiers are used "to target content for playback on individual mobile playback devices 212" and in Col. 13, lines 6-25 that *library server 260* includes a player ID table, it is respectfully noted that this general disclosure fails to have any relevance to the invention claimed. In this regard, Mott particularly describes that "targeting content" is nothing more than a means/method for using client identifiers to limit the ability to playback any content that has been downloaded into an unauthorized mobile playback device 212. (Col. 12, lines 19-22; Col. 13, lines 44-57). Furthermore, it is respectfully noted that maintaining a player ID table 266 *at the library server 260* does not disclose, teach, or suggest interacting with the client

computer 214, i.e., the computer that receives content from the library server 260, to associate content *to be retrieved* with at least one device to which that content, after it is retrieved and stored, is to be automatically delivered. Accordingly, because Mott simply fails to expressly or inherently disclose the exact invention that is set forth within the claims as is required to maintain a rejection under 35 U.S.C. § 102, e.g., Mott fails to disclose, teach, or suggest a local server being provided with input, via a GUI or otherwise, the functions to *pre-associate* a playback device with content that is to be downloaded to thereby automatically deliver content to that playback device when content is actually downloaded to the local server from a library server via a WAN, it is respectfully submitted that the rejection of the claims under 35 U.S.C. § 102 must be withdrawn.

CONCLUSION

It is respectfully submitted that the application is in good and proper form for allowance. Such action on the part of the Examiner is respectfully requested.

Respectfully Submitted;

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